

## **Overall approach**

*Question 1: Do you have any comments on the proposal to maintain an overall continuity of approach with REF 2014, as outlined in paragraphs 10 and 23?*

*The College welcomes the proposal to maintain an overall continuity of approach with REF 2014 where its ability to recognise, assess and fund high quality research is not compromised. The College supports maintaining the outputs, impact and environment structure. Peer review should form the basis for assessing outputs; however panels should consider further use of peer review moderated bibliometrics for those disciplines that, in the panel's judgement, would suit such an approach.*

*By maintaining the broad structure of the REF, and broadly similar rules, institutions will be able to draw on their experience of REF 2014 in order to prepare submissions more efficiently. Similarly, the team running the REF will also be able to draw more readily on REF 2014 experience.*

*Any major changes to the exercise will require both HEPs and the body running the REF to invest additional time and effort in understanding new structures, processes and rules.*

## **Unit of Assessment structure**

*Question 2: What comments do you have about the Unit of Assessment structure in REF 2021?*

*The level of granularity in REF 2014 was broadly correct. Further consolidation of UoAs may make it hard to identify excellence within individual fields and could lead to difficulties in managing the larger sub-panels that would be needed to ensure comprehensive expertise.*

*In 2014, some UoAs were better than others at providing feedback at a greater level of granularity than the whole UoA (e.g. at a research group/theme level), and this has made it particularly difficult for institutions to understand their strengths and weaknesses in very large submissions such as Clinical Medicine, which may contain members from more than one academic department*

*Broadly defined UoAs such as General Engineering present a particular problem. Whilst some submissions will reflect large multi-disciplinary departments, others relate to specialised engineering subjects which do not fit into one of the other UoAs. At the College this particularly impacts our department of Bioengineering.*

## **Expert panels**

*Question 3a: Do you agree that the submissions guidance and panel criteria should be developed simultaneously?*

*The College agrees that the submissions guidance and panel criteria should be developed simultaneously, as this would allow for a more coherent and straightforward set of guidelines. These should be developed in full consultation involving learned societies and relevant research communities*

*Question 3b: Do you support the later appointment of sub-panel members, near to the start of the assessment year?*

*On balance, the College does not support this proposal. Although superficially attractive, particularly if members are finalised after the analysis of submission intentions, the later appointment of sub panel members carries a number of risks, including the availability of suitably qualified individuals at short notice and a compressed timetable for sub-panel training and development.*

*Question 4:* Do you agree with the proposed measures outlined at paragraph 35 for improving representativeness on the panels?

*The College agrees that the proposed measures outlined could help to improve the representativeness of panels; however it is important to ensure that these are not the main criteria for selecting members, which should be expertise, competence and coverage of the subject area.*

*Question 5a:* Based on the options described at paragraphs 36 to 38, what approach do you think should be taken to nominating panel members?

*The College supports the existing approach to nominations, as it provides a good balance between independence from HEP interests and the need to select panel members who have the full confidence of the academic community.*

*Question 5b:* Do you agree with the proposal to require nominating bodies to provide equality and diversity information?

*The College supports the proposal, but would draw attention to the need to manage the burden placed on nominating bodies.*

*Question 6:* Please comment on any additions or amendments to the list of nominating bodies (see Appendix A)

*The College believes the following companies should be added to the list of nominating bodies: BTG, BP, Edwardian Hotel Group and Tata.*

## **Staff**

*Question 7:* Do you have any comments on the proposal to use HESA cost centres to map research-active staff to UOAs and are there any alternative approaches that should be considered?

*The College does not support the proposal to use HESA cost centre data to map staff to Units of Assessment. Cost centre data primarily reflects the organisational structure of teaching, not research. Whilst these often coincide to a large degree, there are significant cases where an individual employed in a department undertakes research primarily in the context of another department or a cross-department grouping. REF UoAs should reflect communities of researchers as they exist on the ground. This is particularly important if e.g. UoA Environment statements are to be meaningful. The College would however support the use of HESA data to determine the population of the REF as a whole.*

*Question 8:* What comments do you have on the proposed definition of 'research-active' staff, described in paragraph 43?

*The College broadly agrees with the proposed definition of research active staff. Any measure of independence should normally (see question 13 below) exclude staff employed on research grants or contracts, except where the individual concerned is the Principal Investigator on that grant or contract.*

*The College, in common with other HEPs, has a number of very senior staff on teaching and research contracts who are not currently assigned any research duties. There would need to be a mechanism for appropriately returning staff who exceptionally fall into this category, perhaps via a separate Unit of Assessment (analogous to the former UoA99).*

Question 9: With regard to the issues raised in relation to decoupling staff and outputs, what comments do you have on:

- a. The proposal to require an average of two outputs per full-time equivalent staff returned?

*The College is concerned that the proposal to require an average of only 2 outputs per staff member will decrease the ability of the REF to discriminate at the top end of the quality scale. Given that 55% of QR funding is distributed to the top 10% of institutions in the REF, this would diminish the ability of the REF to ensure the effective distribution of QR funding. To avoid this, the College recommends an average of at least three (and ideally four) outputs per full-time equivalent staff for each unit of assessment where an institution makes a submission.*

- b. The maximum number of outputs for each staff member?

*The College would support a maximum of 6 outputs per staff member in order to enable submissions to capture the work of researchers with a significant quantity of high quality research.*

- c. Setting a minimum requirement of one for each staff member?

*The College would not support a minimum of zero outputs per staff member: It would be difficult to justify how a researcher returned with zero outputs could be defined as 'research active', and returning a significant number of researchers with no outputs into the REF could send an unwelcome signal to international partners about the strength of the UK research base.*

*The College's ideal position is for all 'research active' staff to be included in the REF, with a minimum of one and maximum of six publications per individual, with a total number of publications equivalent to three or four times the staff FTE. However, we recognise that this may not be practicable. In the event that one or more of these principles needs to be set aside in order to produce a manageable REF, the College's preference would be to re-introduce staff selection. The ability to differentiate between high quality institutions should be preserved by requiring at least 3 outputs per FTE.*

Question 10: What are your comments on the issues described in relation to portability of outputs, specifically:

- a. Is acceptance for publication a suitable marker to identify outputs that an institution can submit and how would this apply across different output types?

*For journal outputs, acceptance for publication is no worse a marker than any other. The majority of other outputs, including conference proceedings, have no clear 'acceptance' date and so alternative measures would be needed e.g. the date of the conference for conference proceedings.*

- b. What challenges would your institution face in verifying the eligibility of outputs?

*As noted above, there would be no issue for journal articles, but there could be challenges for other types of output.*

- c. Would non-portability have a negative impact on certain groups and how might this be mitigated?

*The College does not consider that non-portability will necessarily impact negatively on certain groups. Equally, however, the College does not believe that it will remove the REF 'transfer market', but will simply result in a change in timing of the 'window'.*

d. What comments do you have on sharing outputs proportionally across institutions?

*The College does not agree with the proposal to share outputs proportionally across institutions. Any process is likely to be burdensome.*

*Question 11: Do you support the introduction of a mandatory requirement for the Open Researcher and Contributor ID (ORCID) to be used as the staff identifier, in the event that information about individual staff members continues to be collected in REF 2021?*

*The College strongly supports the uptake of ORCID across the sector as a means of reducing the administrative load. However, it is not clear that these benefits are directly relevant to the REF, particularly if data is drawn from the HESA staff record, which already provides a unique identifier for individuals.*

*The REF should not be used as an instrument to drive any agenda which is not integral to the REF. Therefore, unless the use of ORCID provides direct and demonstrable efficiencies in running the exercise, its use should not be mandatory.*

*Question 12: What comments do you have on the proposal to remove Category C as a category of eligible staff?*

*The College believes that the inclusion of Category C staff presents an important opportunity for HEPs to demonstrate connectedness with user communities e.g. industry, the NHS. In particular the inclusion of research active NHS staff as Category C enables the close working relationship between HEPs and Trusts to be recognised without the need for complex contractual arrangements, and without discriminating between medical schools based on historic arrangements for the employment of research active clinicians.*

*Question 13: What comments do you have on the definition of research assistants?*

*Whatever definition is adopted must allow the inclusion in the REF of staff who are PIs on the grants that fund their salaries (e.g. Fellows).*

*Question 14: What comments do you have on the proposal for staff on fractional contracts and is a minimum of 0.2 FTE appropriate?*

*The College agrees with the proposal to assess the connection of staff on fractional contracts to the submitting unit, so long as this is not too subjective or onerous. A short statement as proposed should suffice. The minimum of 0.2 FTE is appropriate.*

## **Collaboration**

*Question 15: What are your comments on better supporting collaboration between academia and organisations beyond higher education in REF 2021?*

*The environment template offers an opportunity for universities to demonstrate what they are doing to support collaboration, with metrics used to evidence collaborative funding and publication. Collaboration outside of the organisation should be viewed as a strength rather than a weakness of institutional research environment.*

## Outputs

*Question 16:* Do you agree with the proposal to allow the submission of a reserve output in cases where the publication of the preferred output will postdate the submission deadline?

*The College supports the proposal, with the proviso that any outputs not assessed in REF 2021 (either reserve or not) should not be discounted from future assessment exercises.*

*Question 17:* What are your comments on the assessment of interdisciplinary research in REF 2021?

*The College agrees with the proposal for interdisciplinary 'champions' on the sub-panels. There would need to be a method of ensuring such champions were genuinely interdisciplinary, for example a record of publishing in different fields beyond their own. It should also be noted that such champions may not necessarily be able to comment fully on the full range of cross-overs between disciplines.*

*Question 18:* Do you agree with the proposal for using quantitative data to inform the assessment of outputs, where considered appropriate for the discipline? If you agree, have you any suggestions for data that could be provided to the panels at output and aggregate level?

*The College agrees that in assessing outputs, panels should consider further use of peer review moderated bibliometrics for those disciplines that, in the panel's judgement, would suit such an approach. The methodology should be transparent and made known well in advance of the submission date. Equality concerns should be addressed by establishing appropriate benchmarks for metrics used.*

## Impact

*Question 19:* Do you agree with the proposal to maintain consistency where possible with the REF 2014 impact assessment process?

*The College agrees with the proposal to maintain consistency where possible with the REF 2014 impact assessment process. A large part of the cost and burden of REF 2014 was due to the novelty of including impact assessment as a new dimension. Maintaining consistency will be key to help reduce burden in the second REF and will ensure comparability between the two exercises.*

*Question 20:* What comments do you have on the recommendation to broaden and deepen the definition of impact?

*The College agrees that the definition of impact should be broadened and deepened, particularly to cover public engagement impacts.*

*Question 21:* Do you agree with the proposal for the funding bodies and Research Councils UK to align their definitions of academic and wider impact? If yes, what comments do you have on the proposed definitions?

*The College agrees with the proposal to align the definitions, as this would avoid confusion. The College agrees that academic impact should continue to be assessed through the 'outputs' section, with the 'impact' section capturing wider impact.*

*Question 22:* What comments do you have on the criteria of reach and significance?

*The existing definitions are reasonable and should be kept the same to maintain consistency with REF 2014.*

Question 23: What do you think about having further guidance for public engagement impacts and what do you think would be helpful?

*The College agrees that further guidance would add clarity. This could include drawing attention to existing examples of good case studies and providing more guidance on acceptable evidence (both quantitative and qualitative).*

Question 24: Do you agree with the proposal that impacts should remain eligible for submission by the institution or institutions in which the associated research has been conducted?

*The College agrees that impacts should remain eligible for submission by the institution where research was conducted. This will maintain consistency between REF exercises, reducing the costs and burden. Keeping 'impacts' with institutions also helps to embed a culture of capturing impact.*

Question 25: Do you agree that the approach to supporting and enabling impact should be captured as an explicit section of the environment element of the assessment?

*The College agrees with this approach. Incorporating the most useful elements of the impact template into a simplified prescriptive environment template with word-limited response fields would reduce the workload for both institutions and panel members.*

Question 26: What comments do you have on the suggested approaches to determining the required number of case studies? Are there alternative approaches that merit consideration?

*The College agrees that the total number of case studies should not increase beyond that submitted to REF 2014. The increase in staff as a result of the requirement to submit all research active staff naturally means that the ratio of case studies per staff member submitted must reduce.*

Question 27: Do you agree with the proposal to include mandatory fields (paragraph 96) in the impact case study template to support the assessment and audit process better?

*The College agrees that mandatory fields will aid the assessment and audit process, with the proviso that these fields are not too long or onerous.*

Question 28: What comments do you have on the inclusion of further optional fields in the impact case study template (paragraph 97)?

*Optional fields will allow some degree of flexibility, which is necessary when assessing a broad spectrum of activities.*

Question 29: What comments do you have on the inclusion of examples of impact arising from research activity and bodies of work as well as from specific research outputs?

*The College has no objections to the inclusion of impact arising from research activities and bodies of work, provided the level of excellence of the underpinning research can be demonstrated.*

Question 30: Do you agree with the proposed timeframe for the underpinning research activity ( 1 January 2000 to 31 December 2020)?

*The proposed timeframe would be consistent with REF 2014, however consideration should be given to certain disciplines where impacts take longer to emerge. Conversely, other disciplines may have a shorter timeframe for impact, and the guidance should clarify that evidence of impact is not necessarily required across the full timeframe.*

*Question 31:* What are your views on the suggestion that the threshold criterion for underpinning research, research activity or a body of work should be based on standards of rigour? Do you have suggestions for how rigour could be assessed?

*The College believes that the link between impact and research excellence should continue to be based on originality, significance and rigour and that the threshold should be strengthened to being underpinned by research of 3\* quality.*

*Question 32:* Evaluation of REF 2014 found that provision of impact evidence was challenging for HEIs and panels. Do you have any comments on the following:

- a. The suggestion to provide audit evidence to the panels?
- b. The development of guidelines for the use and standard of quantitative data as evidence for impact?
- c. Do you have any other comments on evidencing impacts in REF 2021?

*Quantitative data is not appropriate in all cases and should not be relied upon alone, however the development of guidelines for the use and standard as evidence for impact would be helpful.*

*Question 33:* What are your views on the issues and rules around submitting examples of impact in REF 2021 that were returned in REF 2014?

*The College supports allowing the re-submission of REF 2014 case studies, so long as there is evidence of additional impact beyond that demonstrated in REF 2014. The funding bodies should publish very clear guidance on the rules and evidence around re-submission as early as possible. So long as these are robust, there should not be a need to apply an arbitrary cap on the proportion of case studies which can be resubmitted.*

## **Environment**

*Question 34a:* Do you agree with the proposal to improve the structure of the environment template and introduce more quantitative data into this aspect of the assessment?

*The College agrees with the proposal to improve the structure of the environment template by an increased and better use of existing metrics. Qualitative elements should be assessed via a prescriptive template with word-limited response fields to discourage 'essay writing'.*

*Question 34b:* Do you have suggestions of data already held by institutions that would provide panels with a valuable insight into the research environment?

*The College agrees that, in order to reduce burden and ensure comparability, there should be a focus on data already collected in a consistent way. This could include, for example, data contained within Athena Swan applications and HEB-CI data collected by HESA on commercialisation, spin-out and IP activity.*

*Question 35:* Do you have any comment on the ways in which the environment element can give more recognition to universities' collaboration beyond higher education?

*This could be captured through e.g. levels of public engagement, partnerships with industry and industry income.*

*Question 36:* Do you agree with the proposals for awarding additional credit to units for open access?

*Whilst the College strongly supports open access, the REF is not an appropriate place for it to be incentivised as it detracts from the focus of the REF in identifying research excellence.*

Question 37: What comments do you have on ways to incentivise units to share and manage their research data more effectively?

*The College does not agree that it is appropriate to use the REF as a regulatory or compliance tool.*

### **Institutional-level assessment**

Question 38: What are your views on the introduction of institutional-level assessment of impact and environment?

*The College welcomes the introduction of a more institutional-level assessment of impact and environment, however, clear guidance is needed at the earliest possible stage regarding how this would work in practice, including what the funding bodies would be seeking in an institutional-level impact case study that would be different from a UoA-level one, for example.*

*Institutional impact case studies would provide institutions with the flexibility to demonstrate interdisciplinary impacts spanning across the institutions, such as via Research Institutes.*

*An institutional-level environment statement would help to reduce burden by allowing universities to demonstrate institutional strategy, critical mass of research excellence and key interdisciplinary links across the institution all in one place, rather than repeating this for each UoA.*

Question 39: Do you have any comments on the factors that should be considered when piloting an institutional-level assessment?

*It is important to run a pilot as this would form a significant new part of REF. The pilot should not be so onerous that large institutions are discouraged from volunteering. For example, a pilot involving a large number of institutional impact case studies would be overly burdensome for large institutions.*

### **Outcomes and weighting**

Question 40: What comments do you have on the proposed approach to creating the overall quality profile for each submission?

*The College supports the proposed approach of combining the institutional assessment within the quality profile of each UoA as this should allow greater graduation in the outcomes.*

Question 41: Given the proposal that the weighting for outputs remain at 65 per cent, do you agree that the overall weighting for impact should remain at 20 per cent?

*The College believe that the overall weighting of impact should be increased to 25%. The introduction of impact in REF 2014 has been unequivocally successful and it is now appropriate to increase its weighting to as originally intended when impact was first introduced.*

Question 42: Do you agree with the proposed split of the weightings between the institutional and submission-level elements of impact and environment?

*The College believes it would be better to finalise the weightings split after the pilot of institutional level assessment.*

### **Proposed timetable for REF 2021**

Question 43: What comments do you have on the proposed timetable for REF 2021?

*One of the weaknesses of REF 2014 was that guidance was published late in the process and there were difficulties when changes and updates to the guidance came at different points during the exercise. The current timetable projects that the funding bodies will publish guidance in 2018, but it*

would be helpful if they could undertake a commitment to publish final and complete guidance sooner than that, for example at the latest by October 2017, in order to allow institutions sufficient time to understand and implement it.

### **Other comments**

*Question 44:* Are there proposals not referred to above, or captured in your response so far, that you feel should be considered? If so, what are they and what is the rationale for their inclusion?

*The credibility and effectiveness of the REF will be undermined if the results are not used to selectively fund in a way which effectively discriminates in favour of concentration of excellent research.*

*Grade Inflation has the potential to undermine the REF. Steps must therefore be taken to ensure that grade inflation does not take place. The descriptions for 2\*, 3\* and 4\* research should be reviewed. Cross-panel moderation should be strengthened to ensure that the same high standards apply across all subjects. Links between the performance of a UoA as a whole and the funding available for that UoA should be removed, as these represent an incentive for panels to support grade inflation. In England, HEFCE must remove the link between UoA performance and the 'quanta'.*

*The REF is also undermined if funding allocations do not take full account of the varying costs of research by discipline. In particular, the REF in England is undermined if HEFCE do not adjust the relative weightings applied to research in 'low' 'intermediate' and 'high' cost subjects to more closely reflect the consistent findings of research which they have themselves commissioned .*

*Certain UoAs (such as Psychology, Psychiatry and Neuroscience) contain research of fundamentally different types with fundamentally different costs. The funding bodies should consider how they intend to fund disciplines with fundamentally different costs which are in the same UoA, recognising that averages across the nations are not necessarily reflected in the portfolios of individual HEIs.*